

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
LOUISVILLE GAS AND ELECTRIC COMPANY)	
AND KENTUCKY UTILITIES COMPANY FOR)	
REVIEW, MODIFICATION, AND)	CASE NO.
CONTINUATION OF CERTAIN EXISTING)	2017-00441
DEMAND-SIDE MANAGEMENT AND ENERGY)	
EFFICIENCY PROGRAMS)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION TO
WAL-MART STORES EAST, LP AND SAM'S EAST, INC.

Wal-Mart Stores East, LP, and Sam's East, Inc. (jointly "Wal-Mart"), pursuant to 807 KAR 5:001, is to file with the Commission an original in paper medium and an electronic version of the following information. The information requested herein is due April 19, 2018. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Wal-Mart shall make timely amendments to any prior response if it obtains information which indicates that the response was incorrect when made or, though

correct when made, is now incorrect in any material respect. For any request to which Wal-Mart fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a document containing personal information, Wal-Mart shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to page 12, lines 5–6, of the Direct Testimony of Kenneth E. Baker ("Baker Testimony"), where Mr. Baker recommends, on behalf of Wal-Mart, using a minimum average monthly load factor of 60 percent as a measurable indicator of energy intensity.

a. Explain why a load factor of 60 percent was chosen.

b. Provide the 2017 average load factor of each Wal-Mart and Sam's store in the Louisville Gas and Electric Company and Kentucky Utilities Company (collectively "LG&E/KU") service territory.

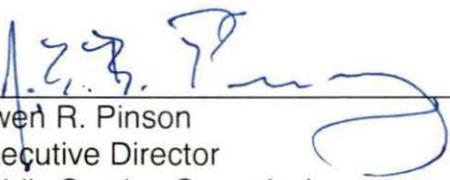
2. Refer to page 12, lines 14–15, of the Baker Testimony, where Mr. Baker recommends, on behalf of Wal-Mart, a proposal where very large customers with loads above 5 MW would be able to opt-out of cost responsibility for LG&E/KU's demand-side management ("DSM") programs regardless of the customer's load factor.

a. Explain why 5 MW was chosen.

b. Provide the monthly loads for 2017 for each Wal-Mart and Sam's store in LG&E/KU's service territory.

3. Refer to page 17, lines 3–5, of the Baker Testimony, where Mr. Baker recommends, on behalf of Wal-Mart, that an aggregated level of annual usage of 15 million kWh aggregated across all sites in a particular utility territory be the benchmark level to be used to allow nonresidential customers to elect to not participate in LG&E's or KU's DSM program. Provide the details of any Commission approved self-directed programs other than Oklahoma and the benchmark standard used in each such program.

4. Refer to page 17, lines 13–16, of the Baker Testimony, where Mr. Baker suggests, on behalf of Wal-Mart, an annual reduction in energy usage of 2.5 percent as a reasonable energy usage reduction requirement. Explain why this level was chosen as a benchmark.

for 
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DATED APR 06 2018

cc: Parties of Record

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